



**U.S. Department of Justice**

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October 19, 2023

The Honorable Stephanie A. Gallagher  
United States District Judge  
U.S. Courthouse  
101 W. Lombard St.  
Baltimore, MD 21201

RE: United States v. Jamal Brownlee, et al.  
Crim No.: SAG-22-0125

Dear Judge Gallagher:

The government filed a status letter on September 18, 2023 and the Court ordered another status report to be filed by October 18, 2023. ECF No. 284. As noted in the September 2023 status update, Tony Garcia, Esquire had just entered his appearance on behalf of defendant Deandre Hill and an attorney inquiry hearing had been requested for defendant Rodney Gaines, but had not been set. Since that status update, an attorney inquiry hearing date has been set for October 30, 2023.

Additionally, on September 14, 2023, a federal grand jury returned a sealed Third Superseding Indictment, which includes new allegations against some of the current defendants as well as charges against a new defendant. That new defendant has since been arrested, had his initial appearance and detention hearing, and been appointed counsel, David Walsh-Little, Esquire. Mr. Walsh-Little provided the government with a necessary thumb-drive for all the previously provided discovery and for the new discovery related to the new charges. Mr. Garcia has also requested discovery, but the government has not received a thumb-drive from Mr. Garcia to provide the discovery. The government will be providing all counsel with new discovery related to the additional overt acts alleged in the Third Superseding Indictment and anticipates providing that discovery in the next week.

There continues to be active plea negotiations. Two of the twelve defendants have plead guilty and have been sentenced. Two more defendants recently agreed to plead guilty and they have plea hearings scheduled in the next two months. The government anticipates a few additional plea agreements will be signed in the upcoming months.

Additional time seems warranted given the new attorneys on the case, as well as the unknown status of what will occur at the attorney inquiry hearing on October 30, 2023. However, with that being said, current counsel for Rodney Gaines and counsel for Tasha Woodyard are both

requesting a scheduling order and do not consent to speedy trial exclusion. The remaining attorneys on the case request additional time to review discovery and either engage or continue to engage in plea negotiations.

Sincerely,

Erek L. Barron  
United States Attorney

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LaRai Everett  
Assistant United States Attorney

cc: Counsel via ECF filing